

KYM SAMUEL CUSHING

Nevada Bar No. 4242

LARA A. HOOVER

Nevada Bar No. 8123

WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP

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kym.cushing@wilsonelser.com

lara.hoover@wilsonelser.com

Attorneys for Defendant

CONAM MANAGEMENT CORPORATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GRACIELA TOBON,

Plaintiff,

vs.

SILVERADO REAL ESTATE, LLC;
CONAM MANAGEMENT CORPORATION;
DOES I through X, and ROE CORPORATIONS
I through X, inclusive,

Defendants.

CASE NO.:

**NOTICE OF REMOVAL OF ACTION
TO FEDERAL COURT UNDER 28
U.S.C. §1441(b) (DIVERSITY)**

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:

Defendant CONAM MANAGEMENT CORPORATION, by and through its attorneys of record, WILSON, ELSEER, MOSKOWITZ, EDELMAN & DICKER LLP, petitions this Court for the removal of the within action from the District Court of the State of Nevada in and for the County of Clark, in which it is currently pending, to the United States District Court for the District of Nevada at Las Vegas, pursuant to 28 USC §1441(b), et. seq.

As part of this petition, Defendant shows the Court the following:

1. Plaintiff, a resident of Nevada, commenced this matter in the Eighth Judicial District Court, Clark County, State of Nevada in Case No. A-15-713153-C, by the filing of a

complaint on January 29, 2015. A copy of Plaintiff's Complaint is attached hereto as **Exhibit**
"A."

2. Plaintiff filed a First Amended Complaint on February 17, 2015, setting forth her
 claims for relief. A copy of Plaintiff's First Amended Complaint is attached hereto as **Exhibit**
"B."

3. Defendant, CONAM MANAGEMENT CORPORATION, is and at all times
 relevant hereto, a California corporation licensed to do business with its principal place of
 business in California.

4. This is an action for alleged negligence/premises liability. Plaintiff's allegations
 arise from her alleged injuries that occurred in the parking lot area of the Silverado Village
 Apartments. Plaintiff is claiming she "suffered personal injuries to her body, some or all of
 which may be permanent and lasting in nature, and which injuries caused pain and suffering to
 the Plaintiff in an amount in excess of \$10,000. "See Compl. ¶ 10. Plaintiff is also making a
 claim for general damages in excess of \$10,000, a claim for damages for costs of medical care
 and treatment, damages for loss of earnings and/or loss of earning capacity and a claim for
 attorney's fees and costs. Defendant is informed and believes that the amount in controversy
 between the parties is in excess of \$75,000.00.

- a. Plaintiff issued a settlement demand for insurance policy limits on December 19,
 2013. The basis of the policy limits demand was \$101,924.26 in incurred and
 future medical costs. The medical costs were summarized within the settlement
 demand as follows:

American Medical Response	\$ 1,040.25
UMC Hospital	\$ 3,268.90
EMP	\$ 504.95
Desert Radiology Solutions, LLC	\$ 161.00
Spinal Rehabilitation Centers SC	\$ 6,785.00
Strehlow Radiology Consultants	\$ 110.00
DCP Holdings, LLC	\$ 6,600.00
Gary LaTourette	\$ 985.00
Select Physical Therapy	\$ 7,877.00
Desert Orthopaedic Center	\$ 1,431.00
WellCare Pharmacy	\$ 1,739.95
Partell Pharmacy	\$ 121.46

Approximate future medical expenses	\$ 71,300.00
Total Medical Damages	\$101,924.26

b. Defendant CONAM MANAGEMENT CORPORATION was provided with medical records that were purported to be related to treatment from Plaintiff's alleged fall.

5. This Court has original jurisdiction over the subject matter of this action under the provisions of section §1332 of Title 28 U.S.C., in that there is complete diversity between the parties, and more than \$75,000.00 in controversy, exclusive of interest and costs. Pursuant to §1441 of Title 28 U.S.C., Defendant CONAM MANAGEMENT CORPORATION is entitled to remove the action to this Court.

6. A copy of the Complaint and Summons are attached hereto and marked respectively as **Exhibit "A"** and **Exhibit "C."** The Summons and Complaint were served on the resident agent for CONAM MANAGEMENT CORPORATION on February 5, 2015. The First Amended Complaint was electronically filed on February 17, 2015 and is attached as **Exhibit "B."** Counsel for CONAM MANAGEMENT CORPORATION agreed to accept service of the First Amended Complaint on February 23, 2015.

7. A true and correct copy of this Notice of Removal is Being filed this date with the Clerk of the Court for the Eighth Judicial District Court of Clark County, Nevada and is attached hereto as **Exhibit "D."**

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1 8. Based on the forgoing, Defendant CONAM MANAGEMENT CORPORATION
2 hereby removes the action now pending in the Clark County District Court as Case No. A-15-
3 713153-C, assigned to Department XXVII.

4 DATED THIS 26th day of February, 2015.

5 **WILSON, ELSER, MOSKOWITZ,**
6 **EDELMAN & DICKER LLP**

7 BY: 

8 Kym Samuel Cushing
9 Nevada Bar No. 4242

10 Lara A. Hoover

11 Nevada Bar No. 8123

12 300 South 4th Street, 11th Floor

13 Las Vegas, NV89101

14 Attorneys for Defendant

15 CONAM MANAGEMENT CORPORATION
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on this 26th day of February, 2015, I served a true and correct copy of the foregoing **NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT UNDER 28 U.S.C. §1441(b) (DIVERSITY)** as follows:

- ☒ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and/or
- ☐ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk; and/or
- ☐ via hand-delivery to the addressees listed below; and/or
- ☐ via facsimile; and/or
- ☐ by transmitting via email the document listed above to the email address set forth below on this date before 5:00 p.m. (PST/PDT).

Ralph E. Porter, Esq.
RALPH PORTER & ASSOCIATES, P.C.
525 S. Ninth Street
Las Vegas, NV 89101
Attorneys for Plaintiff
Graciela Tobon


An Employee of WILSON ELSEER MOSKOWITZ EDELMAN
& DICKER LLP

EXHIBIT "A"

EXHIBIT "A"

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COMP
Ralph E. Porter, Esq.
Nevada Bar No. 4130
RALPH PORTER & ASSOCIATES, P.C.
525 S. Ninth Street
Las Vegas, Nevada 89101
(702) 384-5800
Attorney for Plaintiff


CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

GRACIELA TOBON,

Plaintiff,

vs.

CONAM MANAGEMENT CORPORATION
d/b/a SILVERADO VILLAS APARTMENTS;
DOES I through X, and ROE CORPORATIONS
I through X, inclusive,

Defendants.

CASE NO.:
DEPT. NO.:

A- 15- 713153- C

XXVI I

COMPLAINT

COMES NOW, Plaintiff, GRACIELA TOBON, and hereby complains and alleges as follows:

1. That at all times mentioned herein, Plaintiff, GRACIELA TOBON, was and is a resident of Clark County, Nevada.

2. That upon information and belief, at all times relevant to this action, Defendant, CONAM MANAGEMENT CORPORATION d/b/a SILVERADO VILLAS APARTMENTS, was a corporation doing business in Las Vegas, Clark County, Nevada and was the owner/operator of the apartment complex located at 3750 Arville Street, Las Vegas, Nevada 89103.

RALPH PORTER & ASSOCIATES, P.C.
525 S. NINTH STREET
LAS VEGAS, NV 89101
(702) 384-5800

1 3. That upon information and belief, at all times relevant to this action,
2 DEFENDANT ROE CORPORATION was a corporation doing business in Las Vegas, Clark
3 County, Nevada and was the owner of the apartment complex located at 3750 Arville Street,
4 Las Vegas, Nevada 89103.

5 4. That the true names or capacities, whether individual, corporate, associate or
6 otherwise of Defendants DOES I through X, ROE CORPORATIONS I through X, are
7 unknown to Plaintiff, who therefore, sues said Defendants by such fictitious names. Plaintiff
8 is informed and believes, and thereon alleges, that each of the Defendants designated as DOE
9 or ROE CORPORATIONS is responsible in some manner for the events and happenings
10 referred to and caused damages proximately to Plaintiff as herein alleged. Plaintiff shall
11 request leave of this Court to amend this Complaint to insert the true names and capacities of
12 Defendants DOES I through X and ROE CORPORATIONS I through X, when the same are
13 ascertained, and will request to join such Defendants in this action at such time.

14 5. That at all times relevant hereto the Defendants, CONAM MANAGEMENT
15 CORPORATION d/b/a SILVERADO VILLAS APARTMENTS and/or DEFENDANT ROE
16 CORPORATION, were and are the owners of certain real property, located in the City of Las
17 Vegas, County of Clark, State of Nevada, at 3750 Arville Street, Las Vegas, Nevada 89103.

18 6. Upon information and belief, that at all times relevant hereto the Defendants,
19 CONAM MANAGEMENT CORPORATION d/b/a SILVERADO VILLAS APARTMENTS
20 and/or DEFENDANT ROE CORPORATION, were authorized and doing business in Clark
21 County, Nevada, and owned, operated and maintained the property where the subject incident
22 occurred.

23 7. That Defendants, CONAM MANAGEMENT CORPORATION d/b/a
24 SILVERADO VILLAS APARTMENTS and/or DEFENDANT ROE CORPORATION, owed
25 a duty to Plaintiff to maintain its premises in a safe condition, including a duty to maintain any
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1 parking structures/parking lots, etc. within and around the property.

2 8. On or about March 1, 2013 at approximately 7:30 p.m., Plaintiff, GRACIELA
3 TOBON, was visiting a friend for the first time at the Silverado Villas Apartments. As
4 Plaintiff was walking through the parking lot (in the dark), she tripped and fell on a concrete
5 parking bumper/stopper that was located in the middle of a parking space on Defendants'
6 property, causing injury.

7
8 9. Defendants failed to use reasonable and ordinary care under the circumstances
9 and caused and/or allowed the concrete parking bumper/stopper to be placed in an area which
10 caused a dangerous condition to exist on the Defendants' premises.

11 10. That the incident and the injuries to Plaintiff were directly and proximately caused
12 by the negligence of Defendants, and each of them, who failed to maintain the property and/or
13 premises in a reasonably safe condition. As a direct and proximate result, Plaintiff tripped and
14 fell on the concrete parking bumper/stopper, causing injury. As a result of Defendants'
15 negligence, Plaintiff suffered personal injuries to her body, some or all of which may be
16 permanent and lasting in nature, and which injuries caused pain and suffering to the Plaintiff in
17 an amount in excess of TEN THOUSAND DOLLARS (\$10,000.00).

18
19 11. That at all times mentioned herein, and prior to the incident referred to herein
20 above, the Defendants, and each of them, knew, or should have known of the existence of a
21 dangerous condition of the property created by virtue of the lack of maintenance in Las Vegas,
22 Nevada. The Defendants, and each of them, negligently failed to take the appropriate
23 measures to ensure the safety of persons on their property. By virtue of the foregoing
24 negligence of Defendants, which negligence was and is concurrent and simultaneous,
25 Defendants failed to maintain their property and/or premises in a reasonably safe condition as
26 required by law in order to preserve the health, safety and welfare of members of the public,
27 including Plaintiff, who was lawfully on the property.
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1 12. As a further direct and proximate result of the foregoing negligence of
2 Defendants, and each of them, Plaintiff sustained a personal injury and has, and may in the
3 future, be caused to expend sums of money for medical care and treatment and related
4 expenses which are incidental thereto, the exact amount of which cannot at this time be
5 ascertained or determined, in as much as the same are still accruing. The Plaintiff will request
6 leave of this Court to amend the Complaint accordingly to show such damages at or before the
7 time of the hearing or trial of this matter.
8

9 13. That as a result of the Defendants' negligence, Plaintiff has incurred, and may
10 in the future incur, a loss of wages, the exact nature and extent of which are unknown at this
11 time.
12

13 14. That is has been necessary for the Plaintiff to retain an attorney to prosecute this
14 action, and the Plaintiff is therefore entitled to an award of attorney's fees as and if provided
15 by law.
16

17 WHEREFORE, Plaintiff, expressly reserving the right to amend the Complaint at the
18 time of trial of the actions herein to include all items of damages not yet ascertained, demands
19 judgment against Defendants, and each of them, as follows:

- 20 1. General damages in an amount in excess of \$10,000;
- 21 2. Damages for costs of medical care and treatment;
- 22 3. Damages for loss of earnings and/or loss of earning capacity;
- 23 4. Reasonable attorney fees and costs of suit incurred herein;

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1 5. For such other and further relief as the Court may deem proper in the premises.

2 DATED this 29 day of January, 2015.

3
4 **RALPH PORTER & ASSOCIATES**


5
6 By 
7 RALPHE. PORTER, ESQ.
8 Nevada Bar No. 4130
9 525 S. Ninth Street
10 Las Vegas, Nevada 89101
11 Attorney for Plaintiff

EXHIBIT “B”

EXHIBIT “B”

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1 **ACOM**
2 Ralph E. Porter, Esq.
3 Nevada Bar No. 4130
4 **RALPH PORTER & ASSOCIATES, P.C.**
5 525 S. Ninth Street
6 Las Vegas, Nevada 89101
7 (702) 384-5800
8 Attorney for Plaintiff



CLERK OF THE COURT

6 **DISTRICT COURT**
7
8 **CLARK COUNTY, NEVADA**

9 GRACIELA TOBON,

10 Plaintiff,

CASE NO.: A-15-713153-C
DEPT. NO.: XXVII

11 vs.

12 SILVERADO REAL ESTATE, LLC;
13 CONAM MANAGEMENT CORPORATION;
14 DOES I through X; ROE CORPORATIONS
15 I through X, inclusive,

16 Defendants.

17 **FIRST AMENDED COMPLAINT**

18 COMES NOW, Plaintiff, GRACIELA TOBON, and hereby complains and alleges as
19 follows:

20 1. That at all times mentioned herein, Plaintiff, GRACIELA TOBON, was and is a
21 resident of Clark County, Nevada.

22 2. That upon information and belief, at all times relevant to this action,
23 Defendant, SILVERADO REAL ESTATE, LLC, was a company doing business in Las
24 Vegas, Clark County, Nevada and was the owner/operator of the apartment complex named
25 the Silverado Villas Apartments and located at 3750 Arville Street, Las Vegas, Nevada 89103.
26

27 3. That upon information and belief, at all times relevant to this action, CONAM
28

RALPH PORTER & ASSOCIATES, P.C.
525 S. NINTH STREET
LAS VEGAS, NV 89101
(702) 384-5800

1 MANAGEMENT CORPORATION was a corporation doing business in Las Vegas, Clark
2 County, Nevada and was the operator/management company of the apartment complex located
3 at 3750 Arville Street, Las Vegas, Nevada 89103.

4 4. That the true names or capacities, whether individual, corporate, associate or
5 otherwise of Defendants DOES I through X, ROE CORPORATIONS I through X, are
6 unknown to Plaintiff, who therefore, sues said Defendants by such fictitious names. Plaintiff
7 is informed and believes, and thereon alleges, that each of the Defendants designated as DOE
8 or ROE CORPORATIONS is responsible in some manner for the events and happenings
9 referred to and caused damages proximately to Plaintiff as herein alleged. Plaintiff shall
10 request leave of this Court to amend this Complaint to insert the true names and capacities of
11 Defendants DOES I through X and ROE CORPORATIONS I through X, when the same are
12 ascertained, and will request to join such Defendants in this action at such time.

13
14
15 5. That at all times relevant hereto the Defendants, SILVERADO REAL ESTATE,
16 LLC and CONAM MANAGEMENT CORPORATION, were and are the owners and/or
17 operators of certain real property, located in the City of Las Vegas, County of Clark, State of
18 Nevada, at 3750 Arville Street, Las Vegas, Nevada 89103.

19 6. Upon information and belief, that at all times relevant hereto the Defendants,
20 SILVERADO REAL ESTATE, LLC and CONAM MANAGEMENT CORPORATION, were
21 authorized and doing business in Clark County, Nevada, and owned, operated and maintained
22 the property where the subject incident occurred.

23
24 7. That Defendants, SILVERADO REAL ESTATE, LLC and CONAM
25 MANAGEMENT CORPORATION, owed a duty to Plaintiff to maintain its premises in a safe
26 condition, including a duty to maintain any parking structures/parking lots, etc. within and
27 around the property.

28 8. On or about March 1, 2013 at approximately 7:30 p.m., Plaintiff, GRACIELA

1 TOBON, was visiting a friend for the first time at the Silverado Villas Apartments. As
2 Plaintiff was walking through the parking lot (in the dark), she tripped and fell on a concrete
3 parking bumper/stopper that was located in the middle of a parking space on Defendants'
4 property, causing injury.

5 9. Defendants failed to use reasonable and ordinary care under the circumstances
6 and caused and/or allowed the concrete parking bumper/stopper to be placed in an area which
7 caused a dangerous condition to exist on the Defendants' premises.

8 10. That the incident and the injuries to Plaintiff were directly and proximately caused
9 by the negligence of Defendants, and each of them, who failed to maintain the property and/or
10 premises in a reasonably safe condition. As a direct and proximate result, Plaintiff tripped and
11 fell on the concrete parking bumper/stopper, causing injury. As a result of Defendants'
12 negligence, Plaintiff suffered personal injuries to her body, some or all of which may be
13 permanent and lasting in nature, and which injuries caused pain and suffering to the Plaintiff in
14 an amount in excess of TEN THOUSAND DOLLARS (\$10,000.00).

15 11. That at all times mentioned herein, and prior to the incident referred to herein
16 above, the Defendants, and each of them, knew, or should have known of the existence of a
17 dangerous condition of the property created by virtue of the lack of maintenance in Las Vegas.
18 Nevada. The Defendants, and each of them, negligently failed to take the appropriate
19 measures to ensure the safety of persons on their property. By virtue of the foregoing
20 negligence of Defendants, which negligence was and is concurrent and simultaneous,
21 Defendants failed to maintain their property and/or premises in a reasonably safe condition as
22 required by law in order to preserve the health, safety and welfare of members of the public,
23 including Plaintiff, who was lawfully on the property.

24 12. As a further direct and proximate result of the foregoing negligence of
25 Defendants, and each of them, Plaintiff sustained a personal injury and has, and may in the
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1 future, be caused to expend sums of money for medical care and treatment and related
2 expenses which are incidental thereto, the exact amount of which cannot at this time be
3 ascertained or determined, in as much as the same are still accruing. The Plaintiff will request
4 leave of this Court to amend the Complaint accordingly to show such damages at or before the
5 time of the hearing or trial of this matter.

6
7 13. That as a result of the Defendants' negligence, Plaintiff has incurred, and may
8 in the future incur, a loss of wages, the exact nature and extent of which are unknown at this
9 time.

10 14. That is has been necessary for the Plaintiff to retain an attorney to prosecute this
11 action, and the Plaintiff is therefore entitled to an award of attorney's fees as and if provided
12 by law.

13
14 WHEREFORE, Plaintiff, expressly reserving the right to amend the Complaint at the
15 time of trial of the actions herein to include all items of damages not yet ascertained, demands
16 judgment against Defendants, and each of them, as follows:

- 17 1. General damages in an amount in excess of \$10,000;
18 2. Damages for costs of medical care and treatment;
19 3. Damages for loss of earnings and/or loss of earning capacity;
20 4. Reasonable attorney fees and costs of suit incurred herein;
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DATED this 17 day of Feb, 2015.

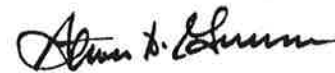
By RALPH E. PORTER, ESQ.
Nevada Bar No. 4130
525 S. Ninth Street
Las Vegas, Nevada 89101
Attorney for Plaintiff

EXHIBIT "C"

EXHIBIT "C"

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AOS
RALPH PORTER & ASSOCIATES, P.C.
525 South 9th Street
Las Vegas, NV 89101
702 384-5800
Attorney for: Plaintiff


CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY NEVADA

GRACIELA TOBON

Plaintiff

CONAM MANAGEMENT CORPORATION D/B/A SILVERADO VILLAS
APARTMENTS

Defendant

Case Number: **A-15-713153-C**

Dept/Div: **XXVII**

RETURN OF SERVICE

KEVIN R. SMITH, being duly sworn deposes and says: that at all times herein affiant was and is a citizen of the United States, over 18 years of age, licensed to serve civil process in the state of Nevada under license #389, and not a party to or interested in the proceeding in which this affidavit is made. The affiant received on Wednesday February 04 2015; 1 copy(ies) of the:

SUMMONS; COMPLAINT

I served the same on Thursday February 05 2015 at 09:20AM by:

Serving Defendant CONAM MANAGEMENT CORPORATION D/B/A SILVERADO VILLAS APARTMENTS, BY SERVING THE PRENTICE-HALL CORPORATION SYSTEM, NEVADA, INC., REGISTERED AGENT

Substituted Service, by leaving the copies with or in the presence of: CAYLA DENNEY, CUSTOMER SERVICE ON BEHALF OF THE PRENTICE-HALL CORPORATION SYSTEM, NEVADA, INC., REGISTERED AGENT, PURSUANT TO NRS 14.020 SUBSECTION 6(B), AS A PERSON OF SUITABLE AGE AND DISCRETION AT THE ADDRESS BELOW, WHICH ADDRESS IS THE MOST RECENT ACTUAL PHYSICAL LOCATION IN THIS STATE AT WHICH THE REGISTERED AGENT IS AVAILABLE FOR SERVICE OF PROCESS, AS SHOWN ON THE CURRENT CERTIFICATE OF DESIGNATION FILED WITH THE SECRETARY OF STATE Authorized Agent. at the Defendant's Business located at 2215-B RENAISSANCE DR, Las Vegas, NV 89119.

Pursuant to NRS 53.045, I declare under the penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

Executed: Friday February 06 2015



Affiant: KEVIN R. SMITH #R-038414
LEGAL WINGS, INC. - NV LIC #389
1118 FREMONT STREET
Las Vegas, NV 89101
(702) 384-0305, FAX (702) 384-8638

EXHIBIT “D”

EXHIBIT “D”

1 **NOTC**

2 **KYM SAMUEL CUSHING**

3 Nevada Bar No. 4242

4 **LARA A. HOOVER**

5 Nevada Bar No. 8123

6 **WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP**

7 300 South 4th Street, 11th Floor

8 Las Vegas, NV 89101-6014

9 702.727.1400; FAX 702.727.1401

10 kym.cushing@wilsonelser.com

11 lara.hoover@wilsonelser.com

12 Attorneys for Defendant

13 *CONAM MANAGEMENT CORPORATION*

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 GRACIELA TOBON,

17 Plaintiff,

18 vs.

19 SILVERADO REAL ESTATE, LLC; CONAM
20 MANAGEMENT CORPORATION;
21 DOES I through X, and ROE
22 CORPORATIONS I through X, inclusive,

23 Defendants.

CASE NO.: A-15-713153-C

DEPT NO.: XXVII

**NOTICE OF REMOVAL OF ACTION
TO FEDERAL COURT**

24 **TO: THE EIGHTH JUDICIAL DISTRICT COURT;**

25 **TO: GRACIELA TOBON, Plaintiff and**

26 **TO: RALPH E. PORTER, ESQ., her attorney.**

27 PLEASE TAKE NOTICE that Defendant CONAM MANAGEMENT CORPORATION,
28 by and through its counsel of record, WILSON, ELSEER, MOSKOWITZ, EDELMAN &
DICKER LLP, has removed this action to the United States District Court, District of Nevada,
pursuant to 28 U.S.C. §1441.

1 A true and correct copy of the Notice of Removal filed in the United States District Court
2 is attached as Exhibit "A."

3 DATED THIS 25th day of February, 2015.

4 **WILSON, ELSER, MOSKOWITZ,**
5 **EDELMAN & DICKER LLP**

6
7 BY: 

8 Kym Samuel Cushing
9 Nevada Bar No. 4242

10 Lara A. Hoover

11 Nevada Bar No. 8123

12 300 South 4th Street, 11th Floor

13 Las Vegas, NV 89101

14 Attorneys for Defendant

15 *CONAM MANAGEMENT CORPORATION*

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on this 26th day of February, 2015, I served a true and correct copy of the foregoing **NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT** as follows:

- ☒ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and/or
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk; and/or
- ☐ via hand-delivery to the addressees listed below; and/or
- ☐ via facsimile; and/or
- ☐ by transmitting via email the document listed above to the email address set forth below on this date before 5:00 p.m. (PST/PDT).

Ralph E. Porter, Esq.
RALPH PORTER & ASSOCIATES, P.C.
525 S. Ninth Street
Las Vegas, NV 89101
Attorneys for Plaintiff
Graciela Tobon


An Employee of WILSON ELSEER MOSKOWITZ EDELMAN
& DICKER LLP